

1 SO. CAL. EQUAL ACCESS GROUP  
2 Jason J. Kim (SBN 190246)  
3 Jason Yoon (SBN 306137)  
4 101 S. Western Ave., Second Floor  
5 Los Angeles, CA 90004  
6 Telephone: (213) 205-6560  
7 cm@SoCalEAG.com

8 Attorneys for Plaintiff  
9 SAM BENFORD

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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

SAM BENFORD,  
Plaintiff,  
vs.

STERLING MACHINERY AUCTIONS  
LLC; DEBRA LOUISE MATTES, AS  
TRUSTEE OF THE DEBRA MATTES  
LIVING TRUST; and DOES 1 to 10,  
Defendants.

**Case No.: 2:25-cv-06630-ODW (MBKx)**

DECLARATION OF JASON J. KIM IN  
SUPPORT OF PLAINTIFF'S OSC  
RESPONSE RE: SUPPLEMENTAL  
JURISDICTION

DECLARATION OF JASON J. KIM

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2 1. I am licensed to practice law in the State of California and before this Court.  
3 I am an attorney with So. Cal. Equal Access Group (“law firm”) and represent Plaintiff  
4 and, in that capacity, am familiar with the contents herein and if called and duly sworn,  
5 could competently testify to them.

6 2. Based on our review of the cases filed by the law firm, the law firm likely  
7 qualifies as a high-frequency litigant, as that term is defined by California Code of Civil  
8 Procedure § 425.55(b)(2), as the law firm has represented as attorney of record 10 or  
9 more high-frequency litigant plaintiffs in actions that were resolved within the 12-month  
10 period immediately preceding the filing of the current complaint alleging a construction-  
11 related accessibility violation.

12 3. However, while the law firm and its attorneys have represented as attorney  
13 of record at least 10 high-frequency litigant plaintiffs, the law firm is unable to ascertain  
14 as to whether it qualifies as a high-frequency litigant given that the violations alleged in  
15 the complaint are generally remedied in whole or in part after the plaintiff files the  
16 complaint as provided in California Code of Civil Procedure § 425.55(b)(2)(C).  
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18 I declare under penalty of perjury under the laws of the United States and the laws  
19 of the State of California that the foregoing is true and correct. Executed on August 15,  
20 2025, at Los Angeles, California.  
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22 /s/ Jason J. Kim

23 JASON J. KIM  
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